Document 0001



SOUTHWEST CENTER FOR ENVIRONMENTAL RESEARCH & POLICY

June 11, 2004

Dr. Ellen Russell NEPA Document Manager Office of Fossil Energy U. S. Department of Energy Washington, D.C. 20585

Re: DOE/EIS-0365

Dr. Russell,

As a binational consortium of universities that has studied border and binational energy issues closely for over five years, we appreciate the opportunity to comment on the Draft EIS for the transboundary power lines in California and Baja California.

We have read the health impact assessment and are discouraged to find that populations in Mexico are not considered in the analysis. By only considering US populations located miles away the assessment ignores and implies a callousness about the health consequences to the much larger and much closer populations that are most at risk. We endorse and promote the concept of a politically-neutral common airbasin when and where meteorology and topography clearly define that the same air is breathed by citizens of different jurisdictions.

Like other organizations, we are extraordinarily sensitive to sovereignty issues but believe the spirit of cooperation and collaboration is forwarded by considerations of needs and impacts to neighboring jurisdictions. Both the United States and Mexico have standards for emissions and ambient air quality as well as the means to enforce them. While the actual standards and mechanisms may be slightly different, the concern for public health is paramount.

Arizona State University • El Colegio de la Frontera Norie • Instituto Tecnològico de Ciudad Auárez.
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Transboundary Environmental Impact Assessments (TEIAs) offer the opportunity to understand, minimize, monitor, and mitigate impacts across international boundaries. The failure of DoE to scope these important components of the overall analysis reflects a disregard for the significance of international relations, health, and overall energy security. The California Resources Agency is setting an excellent TEIA example by considering all impacts to Mexico in the restoration of the Salton Sea. In addition, the trinational Commission for Environmental Cooperation has had, as a collateral mission, since the passage of NAFTA over ten years ago, the task of facilitating such studies and deliberations. The federal government can promote good will by engaging in such transboundary studies.

0001-1 (cont.)

We urge DoE and its consultants to recalculate the health risk assessment with consideration of populations in Mexico. We believe Mexican environmental impact assessments are available and should be consulted. In doing so, the DoE will not only improve conditions for Mexican populations along their northern border, but will strengthen relationships to improve environmental health and quality for U.S. communities along the border with Mexico.

Quela

D. Rick Van Schoik, Managing Director Southwest Center for Environmental Research and Policy (SCERP) Centro de Investigación y Política Ambiental del Suroeste (CIPAS) 5250 Campanile Drive, San Diego, CA 92183-1913 (619) 594-0568, scerp@mail.sdsu.edu, www.scerp.org/

0001-1

December 2004

Document 0002



May 28, 2004

Ms. Ellen Russell Department of Energy Office of Fossil Energy, FE-27 1000 Independence Avenue, S.W. Washington, DC 80585-0301

SUBJECT:

Draft Environmental Impact Statement for the Imperial-Mexicali 230kV

Transmission Lines (DOE/EIS-0365)

Dear Ms. Russell:

This letter is in response to the Draft Environmental Impact Statement received on May 13, 2004 for the above-mentioned project. The documentation was reviewed and the following comments are provided for

1. An encroachment permit shall be secured from the Department of Public Works should Mount Signal Road be use for access to site.

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0002-3

- 2. With regards to Paving Road under the Mitigations Measures No. S.3.4 (pg. S-21; No. S5.9 (pg. S-39); No. 4.1.6 (pg. 4-6); No. 4.2.6 (pg. 4-27); No. 2.4 (pg. 2-38); No. 4.3.6.1 (pg. 4-58); No 4.9.6 (pg. 4-87), please contact this Department for the priority list in which these
- 3. Attached please find a copy of our letter dated October 4, 2001 regarding the Draft Environmental Assessment for this project.
- 4. Please be advised that a Record of Survey may be required per the California Professional Land Surveyors Act. The applicant can contact Charles Lovett, Survey Crew Manager of this Department for further information

Should you have any questions, please do not hesitate to contact this office. Thank you for the opportunity to review and comment on this project.

TIMOTHY B. JO Director of Public Works

FF/dm

cc: Jurg Heuberger, Imperial County Planning Director Lynda Kastoll, BLM-El Centro Field Office

155 South 11th Street El Centro, CA 92243-2853, Tel: (760) 482-4462 • Fax: (760) 352-1272

Document 0003



United States Department of the Interior

U.S. GEOLOGICAL SURVEY Reston, Virginia 20192

JUN 1 5 2004

MEMORANDUM

State Director, Bureau of Land Management To:

Sacramento, California

James F. Devine From: Senior Advisor for Science Applications

Review of Draft Environmental Impact Statement for the Imperial-Mexicali 230-Subject: (ER 04/377)

kV Transmission Lines, Imperial County, California

As requested by the U.S. Department of the Interior, Office of Environmental Policy and Compliance, in their correspondence of May 13, 2004, the U.S. Geological Survey (USGS) has reviewed the subject Draft Environmental Impact Statement (DEIS) and offers the following comments.

GENERAL COMMENTS:

The report does not mention the potential effect of project activity on noxious weed invasion. This issue is significant because the introduction of weedy plant species, which are notably difficult to eradicate once established, can accompany vehicular construction activity. The process can occur as vehicles become weed vectors and because heavy vehicles tend to destroy soil structure at the site of use. This activity causes drastic loss of fragile original soil structure and opens new pathways for weed establishment; the resulting condition could mean a mix of noxious weeds very different from naturally induced weed populations (Westbrooks, 1998).

Discussion of these weed distribution factors in the document should contribute to pro-active project procedures for maintaining weed-free vehicles and for mitigating invasive weeds if they become introduced.

SPECIFIC COMMENT:

Page 3-15, Chapter 3 Affected Environment, Section 3.2 Water Resources, Section 3.2.1 Surface Water Resources, first full paragraph:

The paragraph states an "average" concentration of selenium of 21 micrograms per liter. The USGS suggests that a statement be added to indicate that the average value is based on detection values only. One common approach for describing the variability of water-quality data having censored values (detection and non-detection) is to present all the data in terms of percentiles. In this manner, the variability of the entire data set for the period of record is addressed.

0003-2

0003-1

Imperial-Mexicali FEIS

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Thank you for the opportunity to review and comment on this DEIS.

REFERENCE:

Linsley, RK, Kohler, MA, and Paulhus, JL, 1975, Hydrology for Engineers, McGraw-Hill, New York, 482 p.

Copy to: Office of Environmental Policy and Compliance

Document 0004



July 12, 2004

Mrs. Ellen Russell Fossil Energy, FE-27 U.S. Department of Energy 1000 Independence Avenue, SW Washington, DC 20585-0350

Subject: Border Power Plant Working Group (BPPWG) Comments on Draft
Environmental Impact Statement for Intergen's La Rosita Power Complex
(LRPC) and Sempra's Termoeléctrica de Mexicali (TDM) Transmission Lines

Dear Ellen:

Thank you for this opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the LRPC and TDM transmission lines. The Border Power Plant Working Group (BPPWG) comments on the DEIS are enclosed. BPPWG comments are provided in the order the issues being commented upon are presented in the DEIS. I will present a summary of these comments at the public hearing that the Department of Energy will convene in Calexico on July 14, 2004. Please contact me at (619) 295-2072 if you have any questions about the enclosed comments.

Sincerely,

Bill Powers, P.E.

Bill Powers, P.E. Chair, Border Power Plant Working Group

cc: U.S. Senator Diane Feinstein
U.S. Senator Barbara Boxer
Congressman Bob Filner
State Senator Denise Ducheny
State Assemblyman Juan Vargas
Imperial County Supervisor Joe Maruca
Imperial County APCD Director Steve Birdsall
California Air Resources Board
California Environmental Protection Agency
Colorado River Basin Regional Water Quality Control

Salton Sea Authority New River Wetlands Project Environmental Defense Sierra Club American Lung Association Border Ecology Project Sky Island Alliance Marshall Magruder